

UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF NEW YORK

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In re:

Chapter 11

BOYSIN RALPH LORICK and
CYNTHIA THERESA LORICK,

Case No. 16-45645-NHL

Debtors.

**NOTICE OF APPEARANCE
AND DEMAND FOR SERVICE OF
PAPERS**

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PLEASE TAKE NOTICE, that Certilman Balin Adler & Hyman, LLP, hereby appears as counsel for Soleyman Ghalchi (“Ghalchi”) in the above-captioned case pursuant to section 1109(b) of title 11 of the United States Code (as amended, the “Bankruptcy Code”), Rules 2002, 3017(a), 9007 and 9010 of the Federal Rules of Bankruptcy Procedure (as amended the “Bankruptcy Rules”) and Rule 2002-1 (d) of the Local Rules of Bankruptcy Practice and Procedure of the United States Bankruptcy Court for the Eastern District of New York, and request that copies of any and all notices and papers filed or entered in these cases be given to and served upon the following:

CERTILMAN BALIN ADLER & HYMAN, LLP
90 Merrick Avenue, 9th Floor
East Meadow, New York 11554
(516) 296-7000
Attention: Richard J. McCord, Esq.
Carol A. Glick, Esq.
E-Mail: rmccord@certilmanbalin.com
cglick@certilmanbalin.com

PLEASE TAKE FURTHER NOTICE, that this constitutes not only a request for service of the notices and papers referred to in the Bankruptcy Rules specified above, but also includes, without limitation, a request for service of all orders and notices of any application, motion, petition, pleading, request, complaint or demand, whether formal or informal, whether

written or oral, and whether transmitted or conveyed by mail, courier service, hand delivery, telephone, facsimile transmission, telegraph, telex or otherwise that (1) effects or seeks to affect in any way rights or interests of any creditor or party in interest in these cases, with respect to (a) the Debtors in the above-captioned case and any related adversary proceedings, whether currently pending or later commenced (the “Debtors”); (b) property of the Debtors’ estate, or proceeds thereof, in which the Debtors may claim in interest; or (c) property or proceeds thereof in the possession, custody, or control of others that the Debtors may seek to use; or (2) requires or seeks to require any act or other conduct by a party in interest.

PLEASE TAKE FURTHER NOTICE that this notice of appearance and any subsequent appearance, pleading, claim or suit is not intended nor shall be deemed to waive the rights of Ghalchi: (1) to have an Article III judge adjudicate in the first instance any case, proceeding, matter, or controversy as to which a bankruptcy judge may not enter a final order or judgment consistent with Article III of the United States Constitution; (2) to have final orders in a non-core case, proceeding, matter, or controversy entered only after an opportunity to object to proposed findings of fact and conclusions of law and a *de novo* review by a district court judge; (3) to trial by jury in any case, proceeding, matter, or controversy so triable; (4) to have the reference withdrawn by the United States District Court in any case, proceeding matter, or controversy subject to mandatory or discretionary withdrawal; or (5) any other rights, claims actions, defenses, setoffs, or recoupments to which Ghalchi is or may be entitled under agreements in law, or in equity, all of which rights, claims, actions, defenses, setoffs, and recoupments expressly are hereby reserved. For the avoidance of doubt, filing this notice is not intended as, and shall not be Ghalchi consent to the entry of final orders and judgments in any case, proceeding, matter, or controversy if it is determined that the Court, absent consent of

Ghalchi, cannot enter final orders or judgments in such any case, proceeding, matter, or controversy, as applicable, consistent with Article III of the United States Constitution.

Dated: East Meadow, New York
September 7, 2017

CERTILMAN BALIN ADLER & HYMAN, LLP
Attorneys for Soleyman Ghalchi

By: /s/ Richard J. McCord
RICHARD J. MCCORD (RM3290)
90 Merrick Avenue
East Meadow, New York 11554
(516) 296-7000
rmccord@certilmanbalin.com

TO:

Norma E. Ortiz, Esq.
Ortiz & Ortiz LLP
32-72 Steinway Street
Suite 402
Astoria, NY 11103

Nazar Khodorovsky, Esq.
Office of the United States Trustee
Eastern District of New York
U.S. Federal Office Building
201 Varick Street, Suite 1006
New York, NY 10014

Valerie Smith, Esq.
Synchrony Bank
c/o PRA Receivables Management, LLC
P.O. Box 41021
Norfolk, VA 23541

Keith Brandofino, Esq.
Kilpatrick Townsend & Stockton LLP
The Grace Building
1114 Avenue of the Americas
New York, NY 10036-7703

Colin M. Bernardino, Esq.
Kilpatrick Townsend & Stockton LLP
1100 Peachtree Street NE
Suite 2800
Atlanta, GA 30309-4528
6435537.1

Robert W. Griswold, Esq.
Shapiro, DiCaro & Barak, LLC
One Huntington Quadrangle, Suite 3NO5
Melville, NY 11747